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December 16, 2022

*ADMITTED IN NJ AND PENDING ADMISSION IN NY

VIA ECF

The Honorable Victor Marrero United States District Judge Southern District of New York 500 Pearl Street New York, New York 10007

> Re: United States v. Pedro Mejia 22 Cr. 144 (VM)

Dear Judge Marrero:

Please recall that I represent Mr. Pedro Mejia in his defense of the above-referenced matter. I write to request a change in Mr. Mejia's current bond conditions to permit him to travel into the District of New Jersey for work-related purposes. I have consulted with the Government and United States Pretrial Services Officer Assistant Taelor Nisbeth, both of whom have no objection to this request.

On December 8, 2021, Magistrate Judge James L. Cott ordered Mr. Mejia's release on a \$100,000 personal recognizance bond co-signed by three suretors. Judge Cott imposed conditions of home detention except for employment purposes and other pre-approved activities and restricted Mr. Mejia's travel to the Southern and Eastern Districts of New York. Mr. Mejia surrendered all travel documents and has not made and will not make any applications for new travel documents. On July 1, 2022, Your Honor granted the defense's request to modify Mr. Mejia's bond conditions to remove the condition of home detention and impose a curfew to be determined by United States Pretrial Services. On October 19, 2022, Your Honor granted the defense's request to modify Mr. Mejia's bond conditions to remove the conditions of a curfew and electronic monitoring.

The proposed modification would allow Mr. Mejia to earn additional income by permitting him to drive for a ride-sharing service within the District of New Jersey. Therefore, I respectfully request that Your Honor modify Mr. Mejia's bond conditions to permit him to travel

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to the District of New Jersey for work-related purposes. Thank you for your consideration of this request.

Respectfully submitted,

Mark I. Cohen

MIC/gmf

Cc: A.U.S.A. Thomas Burnett (via ECF)

U.S.P.T.S.O. Ashley L. Cosme (via email)

Mr. Pedro Mejia (via email)

